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Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier  
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*(Additional counsel appear on signature page)*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, and Jon Fitch,  
Brandon Vera, Luis Javier Vazquez, and Kyle  
Kingsbury, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO  
LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule IA 10-  
2 5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the "Protective Order")  
3 issued in this action on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry,  
4 Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all  
5 others similarly situated (collectively, "Plaintiffs") hereby move this Court for leave to lodge under  
6 seal Plaintiffs' Statement Regarding Rule 23 Standards.

7 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly  
8 Confidential – Attorneys' Eyes Only "shall be provisionally lodged under seal with the Court, and  
9 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the  
10 Court, the Party claiming protection shall file a motion to seal setting forth the bases for sealing  
11 and proper authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006),  
12 or some other applicable authority." ECF No. 217 at 15.

13 Portions of Plaintiffs' Statement Regarding Rule 23 Standards refer to materials which  
14 have been designated Confidential or Highly Confidential – Attorneys' Eyes Only by Defendant or  
15 third parties. Accordingly, Plaintiffs seek leave to lodge under seal Plaintiffs' Statement Regarding  
16 Rule 23 Standards. Plaintiffs have filed this document under seal, in accordance with the Court's  
17 ECF system, with the instant motion. Plaintiffs have publicly filed a redacted version of this  
18 document with the Court, and will serve an un-redacted version of this document on Defendant,  
19 in accordance with LR IC 4-1(c)(4).

20 Plaintiffs do not believe that Zuffa's confidentiality designations subject to this motion  
21 meet the applicable compelling reasons standard. However, solely for the limited reason that the  
22 materials referenced, as they currently stand, are still designated Confidential or Highly  
23 Confidential, Plaintiffs seek to file the document in question under seal, in accordance with the  
24 Protective Order. Plaintiffs continue to reserve their right to challenge Zuffa's confidentiality  
25 designations pursuant to Section 6.1 of the Protective Order.

1 Dated: January 9, 2019

Respectfully Submitted,

2 By: /s/ Eric L. Cramer  
3 Eric L. Cramer

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of January, 2019 a true and correct copy of **PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL** and supporting papers was served via the Court's CM/ECF system on all parties or persons requiring notice.

/s/ Eric L. Cramer

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